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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

MADISON SQUARE GARDEN, L.P.,  
ISIAH LORD THOMAS III AND JAMES L.  
DOLAN,

Defendants.

Civil Case No. 06 Civ. 0589 (GEL) (DCF)

ECF CASE

DECLARATION OF  
LUCETTA V. FRANCO

LUCETTA V. FRANCO, under penalty of perjury, affirms and states as follows:

1. I am an attorney with the firm of Eisenberg & Bogas, P.C., which represents Isiah Lord Thomas III in the above-captioned matter. I am admitted to the Bar of the State of Michigan and *pro hac vice* to this court. This declaration is submitted in support of defendants' motion for partial summary judgment and to enclose the following

documents, which are documents filed or produced in discovery for this matter, for the Court's review.

2. Attached hereto as Exhibit A is Plaintiff's Second Amended Complaint dated November 10, 2006.

3. Attached hereto as Exhibit B is Defendant Isiah Thomas' ("Thomas") Answer to Plaintiff's Second Amended Complaint dated December 1, 2006.

4. Attached hereto as Exhibit C is Plaintiff's Response to Defendants' Second Set of Interrogatories and Request for Documents dated October 18, 2006.

5. Attached hereto as Exhibit D are excerpts from the transcript of the deposition of Anucha Browne Sanders ("Browne Sanders") taken on November 27, 2006.

6. Attached hereto as Exhibit E are excerpts from the transcript of the deposition of Thomas taken on December 8, 2006.

7. Attached hereto as Exhibit F are excerpts from the transcript of the deposition of James Dolan ("Dolan") taken on December 11, 2006.

8. Attached hereto as Exhibit G is a Memorandum from Rusty McCormack ("McCormack Memo") dated January 19, 2006.

9. Attached hereto as Exhibit H are excerpts from the transcript of the deposition of Stephen C. Mills ("Mills") taken on December 12, 2006.

10. Attached hereto as Exhibit I are excerpts from the transcript of the deposition of Jeffrey Nix ("Nix") taken on January 26, 2007.

11. Attached hereto as Exhibit J are excerpts from the transcript of the deposition of Hank Ratner ("Ratner") taken on November 30, 2006.

12. Attached hereto as Exhibit K is the Operational Position Description of the

“Senior Vice President, Business Operations” position for the New York Knicks.

13. Attached hereto as Exhibit L are Plaintiff’s Supplemental Disclosures  
Pursuant to Fed. R. Civ. P. 26, dated March 19, 2007.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
on May 4, 2007 in New York, NY.

  
LUCETTA V. FRANCO